



Radiopharmaceutical Sciences

Document ID: QAS-PT-007

Revision No: 2

Cyclotron and Processing Facility
Public Information Disclosure Protocol (PIDP)

PURPOSE/OBJECTIVES

In keeping with Eastern Health's vision, *Health People, Healthy Communities*, the public information disclosure protocol aims to keep the public, as well as key governmental and community stakeholders, informed about activities of the cyclotron and processing facility that may impact, or be of concern to, the population it serves.

The protocol ensures information related to the health, safety and security of persons, the environment, and issues pertinent to the life cycle of the cyclotron and radiopharmaceutical processing facility, are effectively communicated to the public.

The following items are communicated via the public disclosure protocol:

- CNSC Annual Compliance Report;
- Yearly report of licenced activities via document *SAF-RT-001 – Eastern Health – Radiopharmaceutical Sciences Radiation Safety Public Disclosure Program Report* (template included as appendix one);
- Yearly summary of facility milestones via document *SAF-RT-002 – Eastern Health – Radiopharmaceutical Sciences Annual Radiation Public Disclosure Report Summary*;
- Items of concern (e.g., impact of natural events, unplanned significant interruptions of facility operations); and
- Licensing information.

Objectives of the communications protocol include:

- To review information communicated via the [Cyclotron and processing facility webpage](#) regularly to ensure accuracy and relevance to public interest.
- To provide the public with information in plain language that addresses any perceived risk related to the cyclotron and processing facility.
- To demonstrate Eastern Health's commitment to adhering to all regulatory requirements of the Canadian Nuclear Safety Commission and Health Canada.
- To demonstrate the organization's commitment to providing safe, quality and accessible care.

SCOPE

This protocol defines the type of information to report publicly, the anticipated timeline for disclosure, and the potential communications channels for disclosure. Information is presented in a manner that is easily accessible and understandable by the public.

Public disclosure protocol items are communicated, as required, through internal and external communications channels, such as but not limited to:

- external website;
- social media;
- public service announcements, news releases, media advisories;
- weekly email all staff newsletter;
- corporate intranet;
- memos; and
- additional communications channels, as needed.

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TARGET AUDIENCES

Target audiences include internal and external audiences and can be updated, as needed, based on the public disclosure protocol items that are communicated and as requested by current or potential audiences.

Internal Audiences

- Eastern Health physicians, staff and students, including those of the Medical Imaging Program, Radiation Safety Program and Radiopharmaceutical Sciences team as well as those working at the Health Sciences Centre.
- Executive Team.
- Board of Trustees.
- Foundations and volunteers.

External Audiences

- Eastern Health patients, including patients of the Nuclear and Molecular Medicine facility.
- Regulatory/Government stakeholders/departments: Canadian Nuclear Safety Commission (CNSC), Health Canada, Department of Health and Community Services, City of St. John's, targeted stakeholders as required (e.g. elected officials).
- Other Provincial Regional Health Authorities: Western Health, Central Health, Labrador-Grenfell Health.
- Professional associations (e.g. Newfoundland and Labrador Medical Association, NLMA).
- Memorial University staff and students.
- Public, including those living in the vicinity of the cyclotron and processing facility.
- Media (via Eastern Health's media contact list).

PUBLIC AND MEDIA OPINION

The public information and disclosure program is committed to public feedback, evaluation and program improvement. Contact information is available via the [Cyclotron and processing facility webpage](#) and any questions, concerns, views or suggestions from the public are directed to the Radiation Safety Officer. Media inquiries are directed to Eastern Health's Media Relations Manager, who works with the appropriate subject matter experts to provide information and/or to facilitate interviews.

Media monitoring, including monitoring of social media, is conducted daily. Any references to the operations of the cyclotron and processing facility and/or information provided via the protocol would be noted for any action, as appropriate.

All feedback is used to improve the public disclosure program. All changes to the program will be made with the public's views and interests in mind.

Additional information is included in the program evaluation section.

PROGRAM STRATEGY

In order to assess the performance of the Radiation Safety Program and to implement measures to improve effectiveness, an annual evaluation report of the Radiopharmaceutical Sciences Radiation Safety Program is produced by the Program Radiation Safety Officer. Within the report the following major items are discussed:

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- Licence Type, Radiation Safety Program Organization & Committees, Radiopharmaceutical Sciences Organization, Contact Information.
- Analysis of incidents to licenced activities, disclosures, and inspections
- Evaluation of Radiopharmaceutical Sciences staff dosimetry
- Cyclotron workload summary, and production facility updates
- Public Disclosure Program review, summary of communications, summary of public feedback and response, website traffic and engagement metrics (re: communications tactics), as outlined in the *Table 1*.

Communications tactics available to Eastern Health which may be utilized to communicate relevant activities of the cyclotron and processing facility to target audiences, as required, include the following:

Table 1. Communication Tactics

External	Internal
Appointment letter inserts Consultation sessions Client and Family Advisory Council meetings Corporate blog: StoryLine Corporate website PIDP website (Cyclotron and processing facility) Newsletters Digital signage network Events Information booths Information sessions, focus groups and forums Media: News conferences, news releases, media advisories, media availability, media statements, public service announcements (PSAs) Meetings Photography and videography Print materials (posters, booklets, brochures, factsheets, backgrounders) Resident and Family Council meetings Social media channels: Facebook, Twitter, LinkedIn, YouTube Speeches Stakeholder letter Surveys	All management/staff call with CEO Bulletin boards / posted notices and reminders Corporate Intranet Educational events (symposiums, webinars) Email (distribution lists) Events Executive and management team initiatives (greetings, speeches) Information sessions, focus groups and forums Key message document for management to use with staff Meetings (face-to-face; committees; team; huddles) Memos Newsletters – departments/programs, professional associations Photography and videography Print materials (posters, booklets, brochures, factsheets, nursing station drop cards, tent cards) The Pulse+ (weekly all staff e-mail newsletter)

Communication needs are assessed and communications tactics are recommended to address strategic objectives. Relevant tactics are recommended based on the information being communicated and the corresponding target audiences.



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PROGRAM EVALUATION

Program evaluation is completed on an ongoing basis and through annual reports to assess internal and external communication channels and approaches to inform target audiences about activities of the cyclotron and processing facility, as needed.

- Annual Public Disclosure Program review, including a summary of communications, summary of public feedback and response.
- Daily monitoring of traditional media and social media channels for references to the operations of the cyclotron and processing facility and any action, as appropriate.
- Questions/inquiries/feedback received from staff or the public via the cyclotron.safety@easternhealth.ca email address or directed to members of the Radiation Safety Program and Radiopharmaceutical Sciences team.
- Number of media inquiries/responses related to the operations of the cyclotron and processing facility.
- Website traffic/analytics to the [Cyclotron and processing facility webpage](#).
- The collection of statistics and analysis of content to internal and external communication channels used to communicate items via the public disclosure protocol, as required.

Based on the results of the program evaluation, internal and external communications approaches are updated to support objectives.

CONTACT INFORMATION

Questions and concerns about the contents of the public information disclosure protocol, or about the cyclotron and processing facility, can be sent to the following email: cyclotron.safety@easternhealth.ca.

Further contact information can be found within the *Radiopharmaceutical Sciences Radiation Safety Public Disclosure Program Report* posted on the mi.easternhealth.ca website where key members of the Radiation Safety Program and Radiopharmaceutical Sciences team are listed.

DISCLOSURE GUIDELINES

Events, incidents, and information included in the *Table 2* will be disclosed according to the timeframe indicated. Eastern Health aims to publish information in a timely manner for the benefit of the public. This information is released as soon as Eastern Health staff can complete initial investigation steps to ensure that the information released is as accurate as possible. All information is published according to Eastern Health established protocols.

Radiopharmaceutical Sciences

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Table 2. Disclosure Rubric

Information for Disclosure	Target Disclosure Timeframe
CNSC Licence information	Within 2 weeks of an update.
CNSC Annual Compliance Report (ACR)	Within 2 weeks of CNSC submission.
Annual Radiation Safety Public Disclosure Report Summary	Within 1 month of end of calendar year.
Notification of planned and unplanned significant interruption	Within 2 weeks of the event.
Important operational developments or events (e.g., labour disputes, expansions, facility changes)	Within 2 weeks of confirmation of the event.
Natural events with potential to have significant impact on protection and safety (e.g., lightning strike, floods, power outage)	Within 2 weeks of the event.
Serious incidents or accidents: <ul style="list-style-type: none"> Fire impacting the facility Lost or stolen nuclear substances Unplanned events exceeding regulatory limits Unplanned environmental release Any facility event resulting in the death or injury of an employee, visitor, or member of the public 	Within 1 week of the event.
Any other event that may have, or is perceived to have, an effect on the safety of the staff, public, or the environment	Within 2 weeks of the event.
Any other event where a disclosure is deemed necessary by Eastern Health	Within 2 weeks of the event.



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APPENDIX ONE – Eastern Health – Radiopharmaceutical Sciences Radiation Safety Public Disclosure Program Report Template



Eastern Health – Radiopharmaceutical Sciences Radiation Safety Public Disclosure Program Report

Timeframe: [MONTH DAY, YEAR to
MONTH DAY, YEAR]

Radiation Safety Office

Eastern Health

300 Prince Phillip Dr

St. Johns, NL, A1B3V6



www.easternhealth.ca

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Radiopharmaceutical Sciences

Document ID: QAS-PT-007

Revision No: 2

Cyclotron and Processing Facility
Public Information Disclosure Protocol (PIDP)

CONTENTS

[TABLE OF CONTENTS IS INSERTED HERE]

Section 1 – General

Cyclotron and Processing Licence

[DESCRIPTION OF REGULATED ACTIVITIES]

Licence Specifics

Licence #

[LICENCE NUMBER]

Licence Type

[LICENCE TYPE]

Use Type

[LICENCE CODE]

Radiation Safety Program Organization

Applicant Authority: [NAME]

[POSITION / TITLE]

Signing Authority: [NAME]

[POSITION / TITLE]

Class II Radiation Safety Officer: [NAME]

Radiopharmaceutical Sciences Organization

Director of Medical Imaging: [NAME]

Manager of Cyclotron: [NAME]

Manager of Production: [NAME]

Public Disclosure Program

[INTRODUCTION TO PUBLIC DISCLOSURE PROGRAM]

Corporate Radiation Safety Committee

[DESCRIPTION OF CORPORATE RADIATION SAFETY COMMITTEE]

Radiation Safety Administration and Operations Group

[DESCRIPTION OF RADIATION SAFETY ADMINISTRATION AND OPERATIONS GROUP]

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Document ID: QAS-PT-007

Revision No: 2

Cyclotron and Processing Facility
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Cyclotron Radiation Safety Group

[DESCRIPTION OF CYCLOTRON RADIATION SAFETY GROUP]

Authorized Users and Training

[DESCRIPTION OF TRAINING GIVEN TO NUCLEAR ENERGY WORKERS AND DESCRIPTION OF USERS]

Incidents

[SUMMARY OF REPORTABLE INCIDENTS]

Disclosures

[DESCRIPTION OF DISCLOSURES AND DISCLOSURE PROCESS]

Waste Management

[DESCRIPTION OF RADIOACTIVE WASTE MANAGEMENT AND DISPOSAL]

Inspections

[SUMMARY OF INSPECTIONS AND FINDINGS]

Section 2 – Personnel Dosimetry

[SUMMARY OF PERSONAL DOSIMETRY CLASSIFIED BY DESIGNATION AND ROLE]

Section 3 – Cyclotron Facility

Operations

[SUMMARY OF CYCLOTRON AND PROCESSING FACILITY OPERATION]

Cyclotron Workload

[SUMMARY OF CYCLOTRON WORKLOAD]

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Public Information Disclosure Protocol (PIDP)

Annual Compliance Report

[SUMMARY OF ANNUAL COMPLIANCE REPORT]

Facility

[DESCRIPTION OF FACILITY UPGRADES AND MILESTONES]

Section 4 – Public Disclosure Program

Program Review

[REVIEW OF THE PUBLIC DISCLOSURE PROGRAM]

Program Communications

[SUMMARY OF COMMUNICATIONS BY DATE]

Public Feedback & Response

[SUMMARY OF PUBLIC FEEDBACK AND RESPONSE BY EASTERN HEALTH]

APPENDIX A – Public Disclosure Protocol

[COPY OF THE CURRENT PUBLIC DISCLOSURE PROTOCOL]

APPENDIX B – Public Disclosure Summary

[COPY OF THE PUBLIC DISCLOSURE PROGRAM SUMMARY FOR THE REPORTABLE TIMEFRAME]

APPENDIX C – Additional Resources

[ADDITIONAL RESOURCES AND EXTERNAL LINKS]

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